BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

RECEIVED

December 6, 2004

AND TO THE OF A	DEC -6 PH 3: 5	PH 3:	-6	DEC	2004
-----------------	----------------	-------	----	-----	------

Re: Petition to Establish Generic Docket to)		T.R.A. DOCKET	ROOM
Consider Amendments to Interconnection)	Docket No. 04-00381		
Agreements Resulting from Changes of Law)	(

PETITION TO INTERVENE OF SECCA

The Southeastern Competitive Carriers Association ("SECCA")¹ petitions the Authority to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310(a).

SECCA is a coalition of competitive local exchange carriers certified by the Tennessee Regulatory Authority ("TRA"). This proceeding will address, among other things, the terms and conditions under which SECCA members may operate in Tennessee. Specifically, this proceeding will consider the impact of decisions of the Federal Communications Commission and the federal courts upon interconnection agreements between SECCA members and BellSouth Telecommunications, Inc. Therefore, the legal rights, duties, privileges, immunities, or other legal interests of SECCA's members may be affected or determined by the outcome of this proceeding. Since no procedural schedule has yet been established, granting this petition will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

SECCA, therefore, asks that this Petition to Intervene be granted.

Respectfully submitted,

Henry Walker

Boult, Cummings, Conners & Berry, PLC

414 Union Street, Suite 1600 Nashville, Tennessee 37219

(615) 252-2363

¹ The members of SECCA include: XO Tennessee, Inc., Time Warner Telecom, Inc., and US LEC of Tennessee, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to:

Guy M. Hicks BellSouth Telecommunications, Inc. 333 Commerce Street, Ste. 2101 Nashville, TN 37201-3300

on this the 6th day of December, 2004

Henry M. Walker